

May 28, 2024

Via PACER

Hon. Arun Subramanian
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 15A
New York, New York 10007

Re: *Wenger S.A. v. Olivet International, Inc. et al.*, Case No. 20-cv-01107 (AS)
Letter Motion to File A Redacted Document (Motion *in limine*)

Dear Judge Subramanian:

We represent plaintiff Wenger, S.A. (“Wenger”) in the above-referenced action. Pursuant to Your Honor’s Individual Rules and Procedures For Civil Cases, Rule 11B and 11C, Standing Order 19-MC-583 and Section 6 of the S.D.N.Y. ECF Rules & Instructions, Wenger respectfully seeks leave to redact its Motion *in limine*, dated May 28, 2024.

Wenger’s Motion *in limine* contains highly confidential and sensitive business information regarding the settlement agreement between Wenger and former defendant, SwissTech IP Co., LLC. Your Honor has previously granted Olivet’s motion to seal the same settlement agreement. (Dkt. 334.) Because Wenger’s request is narrowly tailored to protect only sensitive business information and references from the already sealed settlement agreement, Wenger should be allowed to redact its Motion *in limine* in accordance with the proposed redactions filed concurrently with this Letter Motion.

For the foregoing reasons, Wenger respectfully requests that the Court grant this Letter Motion.

Respectfully submitted,

SO ORDERED.



Arun Subramanian, U.S.D.J.
Date: May 29, 2024

/s/ Michael Lazaroff
Michael Lazaroff